

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:  DOUGLAS D. WARTHAN,  Debtor.	Chapter 7 Bankruptcy Case No. 18-01475
RENEE HANRAHAN, in her sole capacity as Trustee,  Plaintiff,  vs.  TYE WARTHAN and COLIN WARTHAN,  Defendants.	Adversary Case No. 19-09026  Consent Motion to Accept Service and Extend the Deadline

COMES NOW Plaintiff Renee Hanrahan, in her sole capacity as Trustee, by and through her counsel, and in support of this Consent Motion to Accept Service and Extend the Deadline by Which to Answer respectfully states:

1. The Trustee filed a complaint against Tye Warthan and Colin Warthan (collectively, the “Kids”) on August 19, 2019 (Dkt #1) and effectuated service on the Kids by mail on August 21, 2019 (Dkt #3).

2. The Debtor agrees to represent the Kids by accepting service of the complaint and appearing on behalf of the Kids on the condition that the deadline by which to file an answer be extended to November 15, 2019.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Trustee prays the Court enter an order affirming the terms of this Motion and setting the deadline by which the Debtor shall file an answer to be November 15, 2019.

/s/ Eric J. Langston

Eric J. Langston, AT0014001  
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ATTORNEY FOR PLAINTIFF TRUSTEE

**Agreed to and consented by:**

/s/ Bradley R. Kruse

Bradley R. Kruse, AT0004483  
DICKINSON, MACKAMAN,  
TYLER & HAGEN, P.C.  
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ATTORNEY FOR THE DEBTOR,  
DOUGLAS D. WARTHAN

**Certificate of Service**

The undersigned hereby certifies, under penalty of perjury, that a copy of the instrument to which this certificate is attached was mailed via the United States mail with postage fully paid on the 28th day of October 2019, to the parties displayed on the Service List below.

/s/ Wendi C. Scheer

Renee K. Hanrahan  
Chapter 7 Trustee  
P.O. Box 1088  
Cedar Rapids, IA 52406-1088

Tye Warthan  
c/o Doug Warthan  
12350 Barony Dr.  
Dubuque, IA 52001-9636

Patricia M. Reisen-Ottavi  
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Tye Warthan  
c/o Doug Warthan  
860 Clarke Drive  
Dubuque, IA 52001

Bradley R. Kruse  
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699 Walnut St., Suite 1600  
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Colin Warthan  
c/o Doug Warthan  
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TSD, EWL

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RHTE Warthan/Pldgs/Drafts/Consent Motion to Accept Service and Extend the Deadline.102419.1041a.ejl